

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civ. No. 11-440 WDS/KBM

\$48,320.00 IN UNITED STATES CURRENCY,

Defendant,

and

MANOTTIE CHRISTINE CUMMINGS,

Claimant.

SETTLEMENT AGREEMENT AND RELEASE

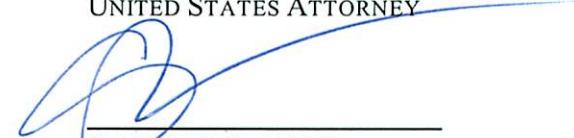
The United States and Claimant Manottie Christine Cummings agree as follows:

1. The United States will return \$5,000 of Defendant Currency, less any debt owed to the United States, any agency of the United States, or any other debt which the United States is authorized to collect, to Paul L. Gabbert Client Trust Account.
2. All right, title, and interest of Claimant Manottie Christine Cummings in the remaining \$43,320 of Defendant Currency will be forfeited to the United States and title thereto vested in the United States.
3. Entry of a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465 is appropriate.
4. Each party will bear its own costs and attorney's fees in this case.
5. The terms of this Settlement Agreement and Release constitute full settlement and satisfaction of any and all claims by Claimant Manottie Christine Cummings.

6. Claimant Manottie Christine Cummings releases and forever discharges the United States, including but not limited to the United States Department of Justice, the U.S. Marshals Service (USMS), the Drug Enforcement Administration (DEA) and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which she has or may have against these government agencies and their employees and agents as a result of the United States' actions with respect to the Defendant Currency.

7. Claimant Manottie Christine Cummings shall hold harmless the United States, including but not limited to the United States Department of Justice, the USMS, the DEA and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which she or any third party, has or may have against these government agencies and her employees and agents as a result of the United States' actions with respect to the Defendant Currency.

KENNETH J. GONZALES
UNITED STATES ATTORNEY

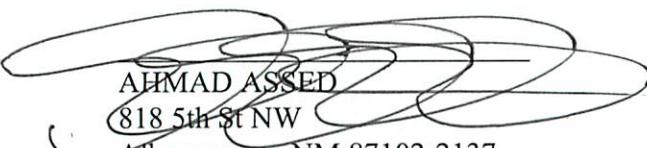


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AGREED BY:


MANOTTIE CHRISTINE CUMMINGS

Claimant


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and

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